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**KOGAN LAW FIRM, APC**  
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Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re	)	Case No. 2:23-bk-10990-SK
LESLIE KLEIN,	)	Chapter 11
Debtor.	)	NOTICE OF FILING OF DECLARATION
	)	OF LESLIE KLEIN REQUESTING
	)	CONTINUANCE OF HEARING RE
	)	MOTION TO WITHDRAW AS COUNSEL
	)	AND OTHER MATTERS ON CALENDAR
	)	OCTOBER 18, 2023
	)	
	)	Date: October 18, 2023
	)	Time: 9:00 a.m.
	)	Place: Courtroom 1575
	)	
	)	
	)	

Attached please find the DECLARATION OF LESLIE KLEIN REQUESTING CONTINUANCE OF HEARING RE MOTION TO WITHDRAW AS COUNSEL AND OTHER MATTERS ON CALENDAR OCTOBER 18, 2023 (the "**Declaration**") along with the email as Exhibit "A", which was received by my offices today at 2:05 p.m. requesting that the Kogan Law Firm, APC file such on behalf of Leslie Klein.

DATED: October 16, 2023 **KOGAN LAW FIRM, APC**

By: /s/ Michael S. Kogan  
Michael S. Kogan  
Attorneys for Debtor

**NOTICE OF FILING OF DECLARATION OF LESLIE KLEIN REQUESTING CONTINUANCE OF  
HEARING RE MOTION TO WITHDRAW AS COUNSEL AND OTHER MATTERS ON CALENDAR  
OCTOBER 18, 2023**

# **EXHIBIT A**

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3 DECLARATION OF LESLIE KLEIN REQUESTING CONTINUANCE OF  
4 HEARING RE MOTION TO WITHDRAW AS COUNSEL AND OTHER  
5 MATTERS ON CALENDAR OCTOBER 18, 2023

6 LESLIE KLEIN states

- 7 1. I am Debtor in the within matter. All matters set forth herein are of  
8 my own first hand knowledge unless stated to the contrary and I am  
9 competent to testify thereto.
- 10 2. I previously, on October 13, 2023, requested my attorney, Michael  
11 Kogan, to request that he request the court for a reasonable  
12 continuance of the hearing on his motion to be relieved as counsel  
13 (and any other matters on calendar on October 18, 2023). He has  
14 declined and stated that I should make such request. I hereby  
15 request that the Court continue such motion and other matters on  
16 calendar for a period of two weeks or such other period as the Court  
17 deem appropriate.
- 18 3. I intend to appear on October 18, 2023.
- 19 4. The Court has on calendar on October 18, 2023 Mr. Kogan's motion  
20 (on order shortening time) to be relieved as matter 20.10 and multiple  
21 other matters through 32.00.
- 22 5. The Trustee has opposed the motion, and while I deny many of the  
23 allegations in his motion, I understand that his point is that he needs  
24 a bankruptcy lawyer representing me to carry out his duties.
- 25 6. I have had oral discussions with a proposed successor attorney but  
26 he is out of the country until the end of October at which time I  
27 anticipate that I will be able to engage him substitute him in in Mr.  
28 Kogan's place.

1 7. I have returned from Israel where I was for Jewish holidays, my return  
2 briefly delayed by the Israel – Hamas war. Now that I am back, I am  
3 in a position to provide Mr. Kogan with requested information.

4 I declare under penalty of perjury under the laws of the United States that the  
5 foregoing is true and correct. Executed October 16, 2023 at Los Angeles,  
6 California.

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8 \_\_\_\_\_

9 Leslie Klein, Debtor  
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DECLARATION OF LESLIE KLEIN REQUESTING CONTINUANCE OF HEARING RE MOTION TO  
WITHDRAW AS COUNSEL AND OTHER MATTERS ON CALENDAR OCTOBER 18, 2023"2



From: kleinlaw@earthlink.net  
Subject: Declaration of Leslie Klein  
Date: Oct 16, 2023 at 2:05:43 PM  
To: Michael Kogan MKogan@koganlawfirm.com  
Cc: Eric J Olson Eric@ejolsonlaw.com

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Dear Michael:

Attached is a copy of the Declaration of Leslie Klein Requesting Continuance of Hearing Re Motion to Withdraw as Counsel and Other matters on Calendar October 18, 2023. [Declaration of Leslie Klein.pdf]

Please file this copy of the Declaration today with the Court.

Thank you.

Leslie Klein

THIS MESSAGE MAY BE A CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION SUBJECT TO EVIDENTIARY PRIVILEGE OR CONTAINING ATTORNEY WORK PRODUCT. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE DELETE THIS MESSAGE AND NOTIFY THE SENDER.



In re: LESLIE KLEIN

Debtor(s).

CHAPTER: 11

CASE NUMBER: 2:23-bk-10990-SK

NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on the CM/ECF docket.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 11500 W. Olympic Blvd., Suite 400, Los Angeles, California 90064

A true and correct copy of the foregoing document described as **NOTICE OF FILING OF DECLARATION OF LESLIE KLEIN REQUESTING CONTINUANCE OF HEARING RE MOTION TO WITHDRAW AS COUNSEL AND OTHER MATTERS ON CALENDAR OCTOBER 18, 2023**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 16, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

☒ Service information continued on attached page

**II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL**(indicate method for each person or entity served):

On **October 16, 2023**, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_ I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**October 16, 2023**

Date

Pamela Lynn

Type Name

/s/Pamela Lynn

Signature

In re: LESLIE KLEIN

Debtor(s).

CHAPTER: 11

CASE NUMBER: 2:23-bk-10990-SK

**ADDITIONAL SERVICE INFORMATION (if needed):**

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")**

Reem J Bello on behalf of Erica Vago and Joseph Vago  
rbello@goeforlaw.com, kmurphy@goeforlaw.com

Michael Jay Berger on behalf of Attorney-Professional Michael Jay Berger  
michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com; michael.berger@ecf.inforuptcy.com

Greg P Campbell on behalf of Interested Party Courtesy NEF  
ch11ecf@aldridgepate.com, gc@ecf.inforuptcy.com; gcampbell@aldridgepate.com

Baruch C Cohen on behalf of David Berger  
bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com

Baruch C Cohen on behalf of Robert & Esther Mermelstein  
bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com

Theron S Covey on behalf of Creditor Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust  
tcovey@raslg.com, sferry@raslg.com

Jeffrey W Dulberg on behalf of Bradley D. Sharp  
jdulberg@pszjlaw.com

Ron Bender on behalf of Interested Party Life Capital Group, LLC  
rb@lnbyg.com

Dane W Exnowski on behalf of Interested Party Courtesy NEF  
dane.exnowski@mccalla.com, bk.ca@mccalla.com, mccallaecf@ecf.courtdrive.com

Robert P Goe on behalf of Erica Vago and Joseph Vago  
kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com

Michael I. Gottfried on behalf of A. Gestetner Family Trust and Gestetner Charitable Remainder Unitrust  
mgottfried@elkinskalt.com, cavila@elkinskalt.com, lwageman@elkinskalt.com, docketing@elkinskalt.com

Brandon J Iskander on behalf of Erica Vago and Joseph Vago  
biskander@goeforlaw.com, kmurphy@goeforlaw.com

Michael S Kogan on behalf of Interested Party Michael Kogan Law Firm, APC  
mkogan@koganlawfirm.com

John W Lucas on behalf of Bradley D. Sharp (TR)  
jlucas@pszjlaw.com, ocarpio@pszjlaw.com

Ron Maroko on behalf of U.S. Trustee United States Trustee (LA)  
ron.maroko@usdoj.gov

Kirsten Martinez on behalf of NewRez LLC d/b/a Shellpoint Mortgage Servicing, as servicer for J.P. Morgan Mortgage Acquisition Corp  
Kirsten.Martinez@bonialpc.com, Notices.Bonial@ecf.courtdrive.com

Steven M Mayer on behalf of Jeffrey Siegel  
smayer@mayerlawla.com

Krikor J Meshefejian on behalf of Life Capital Group, LLC  
kjm@lnbyg.com



Kenneth Miskin on behalf of U.S. Trustee United States Trustee (LA)  
Kenneth.M.Miskin@usdoj.gov

Jeffrey P Nolan on behalf of Bradley D. Sharp  
jnolan@pszjlaw.com

Marc A Lieberman on behalf of Interested Party Courtesy NEF  
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Eric J Olson on behalf of Attorney ERIC J OLSON  
eric@ejolsonlaw.com

Jeffrey N Pomerantz on behalf of Bradley D. Sharp (TR)  
jpomerantz@pszjlaw.com

Brian A Procel on behalf of Erica Vago  
bprocel@millerbarondess.com, rdankwa@millerbarondess.com, docket@millerbarondess.com

Joshua L Scheer on behalf of Creditor Ajax Mortgage Loan Trust 2021-D, Mortgage-Backed Securities, Series 2021-D, by U.S. Bank National Association, as Indenture Trustee  
jscheer@scheerlawgroup.com, jscheer@ecf.courtdrive.com

Mark M Sharf (TR)  
mark@sharfllaw.com, C188@ecfcbis.com; sharf1000@gmail.com; 2180473420@filings.docketbird.com

Bradley D. Sharp (TR)  
bsharp@dsi.biz

Nikko Salvatore Stevens on behalf of Franklin Menlo and Franklin Menlo, co-trustee of the Franklin Menlo Irrevocable Trust established March 1, 1983  
nikko@cym.law, mandi@cym.law

Alan G Tippie on behalf of Interested Party Courtesy NEF  
Alan.Tippie@gmlaw.com,  
atippie@ecf.courtdrive.com; Karen.Files@gmlaw.com, patricia.dillamar@gmlaw.com, denise.walker@gmlaw.com

Gary Tokumori on behalf of Interested Party Courtesy NEF  
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United States Trustee (LA)  
ustpregion16.la.ecf@usdoj.gov

Michael L Wachtell on behalf of Interested Party Courtesy NEF  
mwachtell@buchalter.com

John P. Ward on behalf of U.S. Bank, N.A., as Trustee for Velocity Commercial Capital Loan Trust 2018-2  
jward@attleseystorm.com, ezhang@attleseystorm.com

Alex M Weingarten on behalf of Interested Party Courtesy NEF  
aweingarten@willkie.com, lcarter@willkie.com

Clarisse Young on behalf of Creditor Adi Vendrigger  
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Paul P Young on behalf of Franklin Menlo and Franklin Menlo, co-trustee of the Franklin Menlo Irrevocable Trust established March 1, 1983  
paul@cym.law, jaclyn@cym.law

Roye Zur on behalf of Interested Party Courtesy NEF  
rzur@elkinskalt.com, cavila@elkinskalt.com; lwageman@elkinskalt.com; 1648609420@filings.docketbird.com

Simon Aron on behalf of Defendant Kenneth Klein and Shoshana Shrifa Klein  
saron@wrslawyers.com, moster@wrslawyers.com



**II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL - VIA U.S. MAIL**

Hon. Sandra Klein  
U.S. Bankruptcy Court  
255 E. Temple St. #1582  
Los Angeles, CA 90012

**THE DEBTOR (overnight)**

Leslie Klein  
322 N. June St  
Los Angeles, CA 90004

By email - les.kleinlaw@gmail.com